



DEPARTMENT OF THE NAVY
U. S. NAVAL STATION, ROOSEVELT ROADS
PSC 1008, BOX 3001
FPO AA 34051

01.01-01/27/94-00315

5090

Ser N02C-B11/ 000279

12.7 JAN 1994

U.S. Environmental Protection Agency
Region II
Attn: Mr. Andrew Bellina, P.E.
Chief, Hazardous Waste Facilities Branch
26 Federal Plaza
New York, NY 10278

Gentlemen:

The U.S. Environmental Protection Agency has published a Public Notice of the intent of U.S. Naval Station, Roosevelt Roads, to manage hazardous wastes and has requested public comments on the draft permit by January 31, 1994.

In response to this request for comments, U.S. Naval Station, Roosevelt Roads and Atlantic Division, Naval Facilities Engineering Command have prepared comments on the draft Part B permit. Both sets of comments will be forwarded on separate letterhead and, together, will comprise the official Navy position. The Naval Station's comments are forwarded as enclosure (1) of this letter. Enclosure (1) details the operational concerns associated with the draft permit.

Pursuant to 40 CFR 124.11, it is hereby requested that a public hearing be held to discuss the issues addressed herein. In addition, the Naval Station reserves its right to invoke dispute resolution under Executive Orders Numbers 12088 and 12146.

If there are any questions, the technical point of contact is LT S. L. Perkins at (809) 865-4429.

Sincerely,

L. V. MARCHETTE
Commander, CEC, U.S. Navy
Public Works Officer
By direction of the
Commanding Officer

Copy to:
Commander In Chief
U.S. Atlantic Fleet
Code N44
Norfolk, VA 23511-5210

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Codes 181 and 182
Norfolk, VA 23511-2699

DRAFT PERMIT
U.S. NAVAL STATION, ROOSEVELT ROADS
CEIBA, PUERTO RICO
I.D. NUMBER: PR 2170027203

REFERENCE	COMMENTS									
Table of Contents Module III	Add: Appendix A, Scope of Work for a RCRA Facility Investigation.									
Module III, A.3(c)(42) page III-15 second sentence	Replace the words "aluminum sulfide" with "aluminum sulfate".									
Module IV, B.1	Add: <table><tr><td><u>Description</u></td><td><u>EPA HW No.</u></td><td><u>Annual Qty.</u></td></tr><tr><td>Misc. Waste, Acute</td><td>P Codes</td><td>25 lbs</td></tr><tr><td>Misc. Waste, Toxic</td><td>U Codes</td><td>600 lbs</td></tr></table> See attachment (A) for updated table.	<u>Description</u>	<u>EPA HW No.</u>	<u>Annual Qty.</u>	Misc. Waste, Acute	P Codes	25 lbs	Misc. Waste, Toxic	U Codes	600 lbs
<u>Description</u>	<u>EPA HW No.</u>	<u>Annual Qty.</u>								
Misc. Waste, Acute	P Codes	25 lbs								
Misc. Waste, Toxic	U Codes	600 lbs								
Module IV-1 paragraph 2 second sentence	Replace: "Containers of waste will be stored on pallets placed on portable metal racks" with "Containers of waste will be stored on pallets or portable metal racks".									
Module IV-1 paragraph 3 second sentence	Sentence references containers stored on metal racks. Statement should read "... stored on pallets or portable racks ...".									
Attachment A Table C-3 page C-18	Add: <table><tr><td><u>Waste</u></td><td><u>Analytical Parameter</u></td><td><u>Rationale</u></td></tr><tr><td>Misc. Waste, Acute (P Codes)</td><td>TCLP</td><td>a listed waste</td></tr><tr><td>Misc. Waste, Toxic (U Codes)</td><td>TCLP Flashpoint</td><td>a listed waste</td></tr></table> See attachment (B) of updated table.	<u>Waste</u>	<u>Analytical Parameter</u>	<u>Rationale</u>	Misc. Waste, Acute (P Codes)	TCLP	a listed waste	Misc. Waste, Toxic (U Codes)	TCLP Flashpoint	a listed waste
<u>Waste</u>	<u>Analytical Parameter</u>	<u>Rationale</u>								
Misc. Waste, Acute (P Codes)	TCLP	a listed waste								
Misc. Waste, Toxic (U Codes)	TCLP Flashpoint	a listed waste								

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REFERENCE	COMMENTS
Attachment A Section C-2(c) page C-20	Replace first sentence with: Table C-4 identifies test methods to be employed in the analysis plan. After first sentence add: although, any other parameter not listed on Table C-4 must follow procedures of SW846.
Attachment A Section C-2 page C-22.13	See attachment (C) of updated table.
Attachment B Procedures to Prevent Hazards	Section F-3 and F-4 were omitted. Please provide missing sections. Section F-3 refers to waiver of preparedness and prevention requirements (40 CFR 270.14(b)(6)). Section F-4 refers to Preventive Procedures, Structures and Equipment ((40 CFR 270.14(b)(6)(8)).
Attachment C Section H-2 Qualifications of Environmental Engineering Director page H-2	Replace with: "The Environmental Engineering Division Director must have a degree in engineering with a background in environmental. The training record for the Environmental Engineering Division Director is included in Appendix H at the end of this Section.
Section H-3(c) page H-8	Replace statement at the first asterisk, "hold a degree in scientific field", with "have studies background in a scientific field".
Section H-4 page H-8 second sentence	Replace: "The On-Station Safety Training Director is the Director of the Environmental Engineering Division" with "The On-Station Safety Training Director is the EED Hazardous Waste Branch Manager".
Appendix H-1 page H-13	Add: <div style="display: flex; justify-content: space-between;"> <div> <u>Date</u> June 1993 </div> <div> <u>Course Name</u> Hazardous Waste Annual Review and Refresher Course </div> </div>

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REFERENCE	COMMENTS												
Appendix H-1 page H-16	Add: <table><tr><td><u>Date</u></td><td><u>Course Name</u></td></tr><tr><td>December 1990</td><td>HW Site Operation</td></tr><tr><td>June 1993</td><td>HW Annual Review and Refresher Course</td></tr></table>	<u>Date</u>	<u>Course Name</u>	December 1990	HW Site Operation	June 1993	HW Annual Review and Refresher Course						
<u>Date</u>	<u>Course Name</u>												
December 1990	HW Site Operation												
June 1993	HW Annual Review and Refresher Course												
Attachment D Revision No. 5 Section F page F-9	Delete statement: "The lighting in Building 2007 is rated for Class I, Division II service".												
Attachment D Contingency Plan Table G-1 page G-12	Add: <table><tr><td></td><td><u>Waste Description</u></td><td><u>Waste #</u></td><td><u>Waste Code</u></td></tr><tr><td>93</td><td>Misc. Waste, Acute</td><td>P Codes</td><td>1, R, T</td></tr><tr><td>94</td><td>Misc. Waste, Toxic</td><td>U Codes</td><td>1, R</td></tr></table> See attachment (D) for updated table		<u>Waste Description</u>	<u>Waste #</u>	<u>Waste Code</u>	93	Misc. Waste, Acute	P Codes	1, R, T	94	Misc. Waste, Toxic	U Codes	1, R
	<u>Waste Description</u>	<u>Waste #</u>	<u>Waste Code</u>										
93	Misc. Waste, Acute	P Codes	1, R, T										
94	Misc. Waste, Toxic	U Codes	1, R										

Formaldehyde	U122	550
Barium	D005	550
Lindane	U129/D013	600
Carbon Tetrachloride	D019	100
Acetone	U002/D001	500
Chloroform	D022	6000
Methanol	U154	500
Silver Nitrate	D011/D001/D003	50
Misc. Waste, Acute	P CODES	25
Misc. Waste, Chronic		
Misc. Waste, Toxic	U CODES	600 LBS

2. The Permittee is prohibited from storing hazardous wastes that are not identified in Condition B.1 of this module.

C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit. 40 C.F.R. § 264.171.

D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall use a container made of or lined with material which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. 40 C.F.R. § 264.172.

E. MANAGEMENT OF CONTAINERS

1. The Permittee shall keep all containers securely closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. 40 C.F.R. § 264.173
2. The Permittee shall label all containers stored in the container storage area, in accordance with Attachment F of this permit.

TABLE C-3 (cont.)
HAZARDOUS WASTE ANALYTICAL PROTOCOL
at
NAVAL STATION ROOSEVELT ROADS

WASTE	ANALYTICAL PARAMETER	RATIONALE
Free contaminated hydraulic fluid	Chlorinated Fluorocarbons	Waste contains listed solvents.
Calcium Cyanide	Calcium Cyanide	A listed waste.
Formaldehyde	Formaldehyde	A listed waste.
Barium	TCLP for Barium	Contains barium.
Lindane	TCLP	Listed waste
Carbon Tetrachloride	TCLP	Contains carbon tetrachloride
Acetone	Flash Point Acetone	Listed waste with a FP <140°F and is toxic.
Chloroform	TCLP	A listed waste.
Methanol	Flash Point	Listed waste with a FP <140°F.
Silver Nitrate	TCLP	Contains silver.
Misc. Waste, Acute	TCLP	A listed waste
Misc. Waste, Toxic	TCLP Flashpoint	A listed waste

NOTES:

1. Battery electrolyte refers to the sulfuric acid/water mixture drained from lead acid batteries.
2. Cleaning compound refers to aircraft surface cleaning compound whose NSN is 6850-00-835-0085, and is commonly known as TURCO.
3. Blasting dust is the spent sandblasting media which includes glass beads contaminated with heavy metals.
4. Adhesives refers to variety of adhesive materials that contain low flash point solvents.
5. Waste paints include acrylics, enamels, epoxy paints, lacquers, oil based paints, polyurethane paints, varnish, primers, deck coating, and shellac.
6. Painting wastes refers to waste paints or painting related materials that are contaminated with one or more of the following materials: oil, thinners, dirt, halogenated solvents, non-halogenated solvents, corrosive strippers and heavy metals.
7. Mixed waste containing, before use, a total of 10% or more of the F-listed halogenated solvents.
8. Mixed waste containing, before use, less than a total of 10% of the F-listed halogenated solvents.
9. POLs (Petroleum, Oils, and Lubricants) potentially contaminated with one or more ignitable wastes or F-listed solvents.

TABLE C-4c
HAZARDOUS WASTES AT NAVAL STATION ROOSEVELT ROADS

Line Number	Waste Description	Waste Number	Waste Code	Labels	Storage Container	Specification Container	Sampling Method
91	Methanol	U154	I, T	Flammable Liquid Poison	various	5, 5A, 5B, 5C, 5M, 17E, 17C, 5L, 17H, 37A	2
92	Silver Nitrate	D011/D001/D003	I, R, T	Oxidizer	various	No specification requirements for quantities 55 gal or less	1 & 2
93	Misc. Waste, Acute	P Codes	R, T	Oxidizer Poison Corrosive	various	49 CFR Table 172.101	11
93	Misc. Waste, Toxic	U Codes	I, R, T	Oxidizer Poison Corrosive Flammable	various	49 CFR Table 172.101	11

NOTES:

- Battery electrolyte refers to the sulfuric acid/water mixture drained from lead acid batteries.
- Cleaning compound refers to aircraft surface cleaning compound whose NSN# is 6850-00-935-0995, and is commonly known as TURCO.
- Blasting boot dust is the spent sandblasting media which includes glass beads contaminated with heavy metals.
- Adhesives refers to variety of adhesive materials that contain low flash point solvents.
- Waste paints include acrylics, enamels, epoxy paints, lacquers, oil based paints, polyurethane paints, varnish, primers, deck coating, and shellac.
- Painting wastes refers to waste paints or painting related materials that are contaminated with one or more of the following materials: oils, thinners, dirt, halogenated solvents, non-halogenated solvents, corrosive strippers and heavy metals.
- Mixed waste containing, before use, a total of 10% or more of the F-listed halogenated solvents.
- Mixed waste containing, before use, less than a total of 10% of the F-listed halogenated solvents.
- POIs (Petroleum, Oils, and Lubricants) potentially contaminated with one or more ignitable wastes or F-listed solvents.
- Method number refers to Table C-5 except that grab samples will be taken from wastes in containers smaller than one gallon.
- Waste includes laboratory chemical reagents and discarded manufactured hazardous substances.

TABLE G-1

HAZARDOUS WASTES
at
NAVAL STATION ROOSEVELT ROADS (cont.)

79	Misc. Non-Halogenated Solvents	F003/F005 I, T D035
80	Miscellaneous POLs ⁹	D001/F001 I, T F002/F003 F005/D018
81	Magnesium Batteries	D003 R
82	Grease Contaminated with Oils	D001/D007 I, T D008/D018
83	Freon Contaminated with Hydraulic Fluid	F002 T
84	Calcium Cyanide	P021 T
85	Formaldehyde	U122 T
86	Barium	D005 T
87	Lindane	U129/D013 T
88	Carbon Tetrachloride	D019 T
89	Acetone	U002/D001 I, T
90	Chloroform	D022 T
91	Methanol	U154 I, T
92	Silver Nitrate	D011/D001 I, R, T D003
93	Misc. Waste, Acute	P Codes
94	Misc. Waste, Toxic	U Codes